

**REMARKS**

Claims 1, 3, 5, 6, 8, 10-12, 14-16 and 30-40 are pending in this application. By this Amendment, independent claims 1 and 8 are amended to even further distinguish over the applied references and by incorporating the features of claims 4 and 29, claim 5 is amended to depend from claim 3, claim 30 is amended to depend from claim 6, claims 36-40 are added, and claims 4 and 29 are canceled without prejudice to, or disclaimer of, the subject matter recited therein. Support for the amendments to claims 1 and 8 can be found, for example, on page 10, lines 6-8 and on page 14, lines 5-8 of the specification. Support for added claims 36-40 can be found, for example, on page 12, lines 1-18 and on page 12, line 32 to page 13, line 25 of the specification. No new matter is added. Reconsideration of this application in view of the above amendments and the following remarks is respectfully requested.

The courtesies extended to Applicant and Applicant's representative by Examiner Phantana-Angkool during the telephone interview held April 9, 2009, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below, which constitute Applicant's record of the interview.

The Office Action rejects claims 1, 3, 5, 8, 10, 14-16 and 29-35 under 35 U.S.C. §103(a) over Oross et al. (Oross), U.S. Patent No. 6,757,002, in view of Westerman et al. (Westerman), U.S. Patent No. 6,888,536<sup>1</sup>. The rejection of cancelled claim 29 is moot. The rejection of the remaining claims is respectfully traversed.

As discussed during the interview, the combination of Oross and Westerman does not disclose, and would not have rendered obvious, an input method or system where translation of a detected input movement to an instruction signal involves a main process and one or more sub-processes, the main process and the one or more sub processes together form a

---

<sup>1</sup> Westerman is listed as 6,888,856 in the Office Action. The correct patent number for Westerman is 6,888,536.

hierarchical control structure in which the main process determines whether an input movement corresponds to a prompt to invoke a particular mode, and where a particular mode is indicated, the main process invokes a sub process in that mode, each sub process is assigned to translate one or more particular input movements into corresponding instruction signals by consulting the knowledge database, the main process manages one or more sub processes by assigning a priority value such that a sub process having a minor priority value does not impede a sub process having a major priority value, as recited in independent claims 1 and 8.

The Office Action acknowledges that the combination of Oross and Westerman does not disclose the features of claim 4 (now incorporated into independent claims 1 and 8). Therefore, independent claims 1 and 8 and their respective dependent claims are patentable over the combination of Oross and Westerman for at least this reason.

The Office Action asserts that Geaghan (cited below) discloses the features of canceled claim 4 (now incorporated into claims 1 and 8). However, as discussed during the interview, Geaghan is directed to a touch system that can identify temporarily overlapping touch events (i.e., where two or more touch points occur simultaneously) (see Abstract). In doing so, the system of Geaghan can discriminate single touches from double (or other multiple) touches by determining whether a certain touch exceeds a threshold level (see Abstract). That is, Geaghan attempts to address the problem of phantom touch inputs due to overlapping touch inputs and for discriminating valid touches from phantom touches. These touch inputs described in Geaghan do not correspond to the claimed main process or sub processes. Therefore, Geaghan fails to overcome the deficiencies of Oross and Westerman for at least these reasons.

Additionally, as discussed during the interview, Oross discloses a general touch sensing area 34 and one or more specialized sensing areas that are dedicated to a specific

function (see Figs. 2 and 10, col. 5, lines 54-57 and col. 6, lines 1-3). Oross discloses that the general touch sensing area 34 is used for controlling cursor movement (see col. 5, lines 54-57). The special touch sensing areas 36, 38 are separate from touch sensing area 34 and can either be dedicated to specific functions or can be user-programmable to implement desired programmable functions (see Fig. 2 and col. 6, lines 1-3). Oross does not disclose that a touch in the general touch sensing area 34 is subjected to a hierarchical control structure with main processes and sub processes. Instead, general touch sensing area 34 merely functions as a cursor.

Westerman fails to overcome the deficiencies of Oross. Specifically, as discussed during the interview, Westerman teaches distinguishing between different types of hand configurations and requires a user to learn the different hand configurations to allow the system to switch between different modes (see col. 7, lines 27-30). Westerman relies purely on recognition of hand configurations to invoke a mode specific algorithm (see col. 13, lines 25-29) and does not disclose utilizing a hierarchical control structure of main processes and sub processes as recited in independent claims 1 and 8. As such, Westerman fails to overcome the deficiencies of Oross.

Therefore, the combination of Oross and Westerman does not disclose, and would not have rendered obvious, an input method or system where translation of a detected input movement to an instruction signal involves a main process and one or more sub-processes, the main process and the one or more sub processes together form a hierarchical control structure in which the main process determines whether an input movement corresponds to a prompt to invoke a particular mode, and where a particular mode is indicated, the main process invokes a sub process in that mode, each sub process is assigned to translate one or more particular input movements into corresponding instruction signals by consulting the knowledge database, the main process manages one or more sub processes by assigning a

priority value such that a sub process having a minor priority value does not impede a sub process having a major priority value, as recited in independent claims 1 and 8.

The Office Action rejects claims 4 and 6 under 35 U.S.C. §103(a) over Oross in view of Westerman, and further in view of Geaghan et al. (Geaghan), U.S. Patent Application Publication No. 2003/0063073 A1; and rejects claims 11 and 12 under 35 U.S.C. §103(a) over Oross in view of Westerman, and further in view of Umeya et al. (Umeya), U.S. Patent No. 6,028,581. The rejection of canceled claim 4 is moot. The rejections of claims 6, 11 and 12 are respectfully traversed.

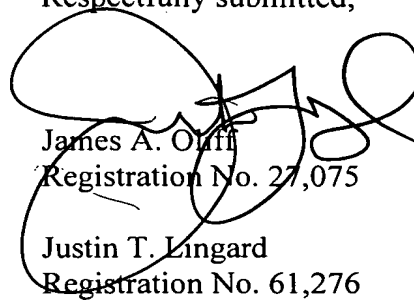
Because claims 6, 11 and 12 incorporate the features of independent claims 1 and 8, respectively, and because Geaghan and Umeya fail to overcome the deficiencies of Oross and Westerman, these claims also are patentable over the applied references for at least these reasons, as well as for the additional features that these claims recite. Thus, it is respectfully requested that the rejections be withdrawn.

Applicant submits that added claims 36-40 also are patentable over the applied references at least based on their dependency from claim 1 as well as for the additional features that these claims recite.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Justin T. Lingard  
Registration No. 61,276

JAO:JTL/emd

Attachment:  
Petition for Extension of Time

Date: April 30, 2009

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 320850**  
**Alexandria, Virginia 22320-4850**  
**Telephone: (703) 836-6400**

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--